



Your business  
is our business.

REDACTED – FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200  
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June 17, 2015

**Via Hand Delivery**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Shidler Telephone Company  
Study Area Code 432023**

Dear Ms. Dortch:

On behalf of Shidler Telephone Company (“Shidler”), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission’s rules.<sup>1</sup> Shidler seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.<sup>2</sup> The redacted version is also being filed this date via the FCC’s Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).<sup>3</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

<sup>3</sup> 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).



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June 17, 2015

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 14-58  
2015 ETC Annual Report of Shidler Telephone Company  
Study Area Code 432023  
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. (“JSI”), on behalf of its client Shidler Telephone Company (“Company”) hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission’s rules,<sup>1</sup> withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).<sup>2</sup>

1. The information for which the Company is seeking confidential treatment is an attachment to the Company’s annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission’s rules (“Report”).<sup>3</sup>
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers (“ETCs”) must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan (“Progress Report”) which is contained in the attachment to the 2015 Report.<sup>4</sup>
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company’s Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

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<sup>1</sup> 47 C.F.R. §§ 0.457, 0.459.

<sup>2</sup> 47 C.F.R. § 0.459(b)(1) through (9).

<sup>3</sup> 47 C.F.R. §§ 54.313, 54.422.

<sup>4</sup> 47 C.F.R. §§ 54.313(a)(1).

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."<sup>5</sup> The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.
6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing

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<sup>5</sup> See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).


the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.

7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

 FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	432023
<015> Study Area Name	SHIDLER TEL CO
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Lisa Patton
<035> Contact Telephone Number: Number of the person identified in data line <030>	9187932211 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	lisa@stinternet.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div>432023ok330.pdf</div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div>432023ok330.pdf</div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div>432023ok510.pdf</div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div>432023ok610.pdf</div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div>432023ok1010.pdf</div> (attach descriptive document)		<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

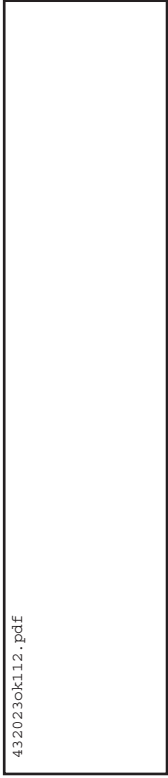
<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>(100) Service Quality Improvement Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<div> <input type="radio"/> (yes / no)                 </div> <div> <input checked="" type="radio"/> (yes / no)                 </div>
<111>		<div> <input type="radio"/> (yes / no)                 </div> <div> <input type="radio"/> (yes / no)                 </div>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	Yes
<114>	Report how much universal service (USF) support was received	Yes
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	Yes
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	Yes
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	Yes
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	Not Applicable

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
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<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

[illegible]

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

1/1/2015	
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-- See attached worksheet





[illegible]

(900) Tribal Lands Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<910>	Tribal Land(s) on which ETC Serves	<div>Osage Nation</div>
<920>	Tribal Government Engagement Obligation	<div>432023ok920.pdf</div>

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

432023ok1210.pdf

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

☒

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,

☒

<1222> Details on the number of minutes provided as part of the plan,

☒

<1223> Additional charges for toll calls, and rates for each such plan.

<b>(2000) Price Cap Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>		July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)i}
- <2011a> 3rd Year Certification {47 CFR § 54.313(b)(1)ii}
- <2011b> Attachment {47 CFR § 54.313(b)(1)ii}

Name of Attached Document(s) Listing Required Information

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}
- <2013> 2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}
- <2014> 2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}
- <2015> 2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

Certification Support Used to Build Broadband

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation	
Data Collection Form	
FCC Form 481	
OMB Control No. 3060-0986/OMB Control No. 3060-0819	
July 2013	

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
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<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div>432023ok3010.pdf</div>	Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<div>432023ok3012.pdf</div>	<div><input checked="" type="checkbox"/></div>
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))	<div>432023ok3012.pdf</div>	<div><input checked="" type="checkbox"/></div>
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<div><input checked="" type="checkbox"/></div>	(Yes/No)
(3014)	If yes, does your company file the RUS annual report	<div><input checked="" type="checkbox"/></div>	(Yes/No)
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div>432023ok3017.pdf</div>	<div><input checked="" type="checkbox"/></div>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div>432023ok3017.pdf</div>	<div><input checked="" type="checkbox"/></div>
(3018)	If the response is no on line 3014, Is your company audited?	<div><input checked="" type="checkbox"/></div>	(Yes/No)
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3021)	Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3023)	Underlying information subjected to a review by an independent certified public accountant	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3024)	Underlying information subjected to an officer certification.	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>
(3026)	Attach the worksheet listing required information	<div><input checked="" type="checkbox"/></div>	<div><input checked="" type="checkbox"/></div>

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	



<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

<b>Certification - Agent / Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	432023
<015> Study Area Name	SHIDLER TEL CO
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035> Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

<b>Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I certify that (Name of Agent) <u>Dee Dee Longenecker</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Dee Dee Longenecker</u>
Name of Reporting Carrier:	<u>SHIDLER TEL CO</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/16/2015</u>
Printed name of Authorized Officer:	<u>Lisa Patton</u>
Title or position of Authorized Officer:	<u>Vice President</u>
Telephone number of Authorized Officer:	<u>9187932211 ext.</u>
Study Area Code of Reporting Carrier:	<u>432023</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

<b>Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier</b>	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>SHIDLER TEL CO</u>
Name of Authorized Agent or Employee of Agent:	<u>Dee Dee Longenecker</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/16/2015</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Dee Dee Longenecker</u>
Title or position of Authorized Agent or Employee of Agent:	<u>Manager - Regulatory Affairs</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5126953954 ext.235</u>
Study Area Code of Reporting Carrier:	<u>432023</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 112**

**Five-Year Network Improvement Plan and  
Progress Report**

**ATTACHMENT REDACTED IN ENTIRETY**

Study Area Code	432023
Study Area Name	Shidler Telephone Company
Company Contact Name	Lisa Patton
Contact Telephone Number	918-793-2211
Contact Email Address	<a href="mailto:lisa@stinternet.net">lisa@stinternet.net</a>

Unfulfilled Broadband Requests - Calendar Year 2014

REF	CUSTOMER NAME	DESCRIPTION OF SERVICE REQUESTED (include requested speed for broadband requests)	DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
1	Customer 1	Wynona customer wanted 6/1 but location was too remote.	Company purchased some Actelis equipment to try to boost existing DSL, but could not achieve requested speed. Customer currently has 3/1 Mbps service and Company continues to work on solution to increase download speed.
2			
3			
4			
5			
6			
7			
8			
9			
47 CFR §54.313 (a)(3)			

**Shidler Telephone Company**

**Study Area Code 432023**

**Response to Line 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance – Voice and Broadband Service**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Shidler Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1); 2) the Truth-in-Billing Rules 47 CFR § 64.2401, as required in the OCC

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

**Shidler Telephone Company**

**Study Area Code 432023**

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and  
Broadband**

Shidler Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).<sup>1</sup> The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”



These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.





(800) Operating Companies  
Data Collection Form

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Lisa Patton
<035>	Contact Telephone Number - Number of person identified in data line <030>	9187932211 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	lisa@stinternet.net
<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	Not Applicable
<812>	Operating Company	Shidler Telephone Company

[illegible]

**Shidler Telephone Company**

**Study Area Code 432023**

**Response to Line 920- Tribal Engagement Obligation**

Shidler Telephone Company (“Company”) serves a small portion of the Osage Nation located in northern Oklahoma. The Company reached out to the Osage Nation in 2014 in an attempt to engage in discussion of the Osage Nation’s needs assessment and deployment planning for the communications needs of Tribal members and the Tribal government institution per the requirements of 47 C.F.R. §54.313(a)(9). In prior discussions, the Osage Nation responded that they were not prepared to discuss communications issues and would contact the Company at such time as they were ready to engage in those discussions. Thus far, the Osage Nation has not contacted the Company to engage in any such discussion. The Company continues to perform required Lifeline outreach and also provided its ETC annual report to the tribal nation annually.

The Company makes best efforts to bring advanced telecommunications services and broadband services to all individuals within its service territory, including all Tribal members. The Company looks forward to further contact in 2015 to determine how the Company’s service plans can be coordinated with the Osage Nation’s special needs and projects planned either in the area or nearby that would affect service.

# Shidler Telephone Company

**Study Area Code: 432023**

## **Rates, Terms and Conditions for Lifeline Service**

**(Response to Form 481, Line 1210)**

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Shidler Telephone Company's tariff(s) on file with the Oklahoma Corporation Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

### Residential Local Exchange Access Line Rates:<sup>(1)(2)</sup>

<b>Exchange Name</b>	<b>R-1 Rate</b>	<b>Res. EAS Charge</b>
Foraker	\$ 16.00	\$ -
Grainola	\$ 16.00	\$ -
Shidler	\$ 16.00	\$ -
Webb City	\$ 16.00	\$ -
Wynona	\$ 11.85	\$ 7.64

<sup>(1)</sup> Above listed fees do not include mandatory taxes, fees and surcharges, including, but not limited to Oklahoma Universal Service Fund charges, 9-1-1 fees, and municipal franchise fees.

<sup>(2)</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

SHIDLER TELEPHONE COMPANY  
Local Exchange Tariff

SECTION 1  
1<sup>st</sup> Revised Page 6

LOCAL EXCHANGE SERVICE

14.0932

IV. LIFELINE SERVICE

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A. Applicability

1. Lifeline Service is a voice telephony service assistance program designed to provide eligible residential customers with a credit to be applied to the price of Residential voice telephony service.
2. Eligible customers will receive a credit as set forth in Section IV. Lifeline Credits below, to be applied to their Residential voice telephony service.
3. Customers shall not receive more than one Lifeline credit regardless of the number of residential voice telephony services or locations the customer receives service within the State of Oklahoma.
4. Lifeline Service shall not be available on a retroactive basis.

B. Designated Services Available to Lifeline Customers (<sup>1</sup>)

The following services shall be offered to eligible Lifeline customers:

1. voice telephony services that provide voice grade access to the public switched network or its functional equivalent;
2. minutes of use for local service provided at no additional charge to end users;
3. access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems; and
4. toll limitation services to qualifying low-income consumers as provided in 47 CFR §54.400.

C. Eligibility Requirements for Lifeline Service On Non-Tribal Lands

1. The customer, one or more of the customer's dependents, or the customer's household (applicant) seeking Lifeline service credit must provide documentation to the Company establishing that the applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.

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Lifeline service may not be disconnected for non-payment of toll charges.

Public Utility Division  
2014000932  
Tariff Sheets Approved  
per 165:55-5-10(c)

Issued: 10-31-14

Legal Authority: OAC 165:55-5-10(c)

Effective: 11-1-14



**LOCAL EXCHANGE SERVICE**

AT

**IV. LIFELINE SERVICE**

**C. Eligibility Requirements for Lifeline Service On Non-Tribal Lands (Continued)**

- a. The applicant must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Supplemental Security Income; Federal Public Housing Assistance (Section 8); Low-Income Home Energy Assistance Program; National School Lunch Program's free lunch program; or Temporary Assistance for Needy Families; or
  - b. An applicant's household income as defined in 47 CFR § 54.400(f) must be at or below 135% of the Federal Poverty Guidelines for a household of that size; or
  - c. Participate in or receive assistance or benefits, as certified by the Oklahoma Department of Human Services, under a program providing Temporary Assistance to Needy Families; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Medical Assistance or Medicaid; or Supplemental Security Income.
  - d. Participate in or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under a program providing vocational rehabilitation, including aid to the hearing impaired; or
  - e. Participate in or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant to the Sales Tax Relief Act, 68 O.S. § 5011 et seq.
2. In addition to meeting the qualifications provided in paragraphs a. through e. above, in order to constitute a qualifying low-income applicant, an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service.
  3. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants' eligibility.
  4. Upon receipt of the applicant's documentation, in accordance with 47 CFR § 54.410, establishing eligibility for Lifeline credit, and the Company's provisioning of Lifeline service to the applicant the Company will begin providing the credit.

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Public Utility Division  
201400093Z  
Tariff Sheets Approved  
per 165:55-5-10(c)



SHIDLER TELEPHONE COMPANY  
Local Exchange Tariff

SECTION 1  
2<sup>nd</sup> Revised Page 8

**LOCAL EXCHANGE SERVICE**

**IV. LIFELINE SERVICE**

**C. Eligibility Requirements for Lifeline Service On Non-Tribal Lands (Continued)**

5. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually, in accordance with 47 CFR § 54.410.
6. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

**D. Lifeline Credits for Lifeline Service On Non-Tribal Lands**

	<u>Monthly Credit</u>
Federal Lifeline Credit:	\$9.25 <sup>1</sup>

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Public Utility Division  
2014000932  
Tariff Sheets Approved  
per 165:55-5-10(c)  
Issued: 10-31-14

Pursuant to OAC 165:55-13-14 (e) the credit applied will not exceed the total of the federal end user charge and the residential local exchange rate, less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.

Legal Authority: OAC 165:55-5-10(c) Effective: 11-1-14

SHIDLER TELEPHONE COMPANY  
Local Exchange Tariff

SECTION 1  
3<sup>rd</sup> Revised Page 9

## LOCAL EXCHANGE SERVICE

### IV. LIFELINE SERVICE

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#### E. Eligibility Requirements for Lifeline Service On Tribal Lands

1. The customer, one or more of the customer's dependents, or the customer's household (applicant) seeking Lifeline service credit must provide documentation to the Company establishing that the applicant meets one or more of the following eligibility requirements prior to receiving the Lifeline service credit.
  - a. The applicant must receive benefits from one of the following federal assistance programs: Medicaid; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Supplemental Security Income; Federal Public Housing Assistance (Section 8); Low-Income Home Energy Assistance Program; National School Lunch Program's free lunch program; or Temporary Assistance for Needy Families; or
  - b. An applicant's household income as defined in 47 CFR § 54.400(f) must be at or below 135% of the Federal Poverty Guidelines for a household of that size; or
  - c. Participate in or receive assistance or benefits, as certified by the Oklahoma Department of Human Services, under a program providing Temporary Assistance to Needy Families; Supplemental Nutrition Assistance Program ("SNAP" f/k/a Food Stamps); Medical Assistance or Medicaid; or Supplemental Security Income.
  - d. Participate in or receive assistance or benefits, as certified by the State Department of Rehabilitation services, under a program providing vocational rehabilitation, including aid to the hearing impaired; or
  - e. Participate in or receive assistance or benefits, as certified by the Oklahoma Tax Commission, pursuant to the Sales Tax Relief Act, 68 O.S. § 5011 et seq.
  - f. A customer who lives on Tribal lands is eligible for Lifeline service as a "qualifying low-income consumer" as defined by 47 CFR § 54.400(a) and as an "eligible resident of Tribal lands" as defined by 47 CFR § 54.400(e) if that customer meets the qualifications for Lifeline specified in paragraphs a. through e. above or if the customer, one or more of the customers dependents, or the

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Public Utility Division  
201400093Z  
Tariff Sheets Approved  
per 165:55-5-10(c)



SHIDLER TELEPHONE COMPANY  
Local Exchange Tariff

SECTION 1  
4<sup>th</sup> Revised Page 10

# LOCAL EXCHANGE SERVICE

## IV. LIFELINE SERVICE

### E. Eligibility Requirements for Lifeline Service On Tribal Lands (continued)

customers household participates in one of the following Tribal-specific federal assistance programs: Bureau of Indian Affairs general assistance; Tribally administered Temporary Assistance for Needy Families; Head Start (only those households meeting its income qualifying standard); or the Food Distribution Program on Indian Reservations.

2. In addition to meeting the qualifications provided in paragraphs a. through e. above, in order to constitute a qualifying low-income applicant, an applicant must not already be receiving a Lifeline service, and there must not be anyone else in the applicant's household subscribed to a Lifeline service.
3. The eligibility requirements listed above will be certified to by the applicant or the applicable state agency. The Company assumes no responsibility for the certification of customers or applicants eligibility.
4. Upon receipt of the applicant's documentation, in accordance with 47 CFR § 54.410, establishing eligibility for Lifeline credit, and the Company's provisioning of Lifeline service to the applicant the Company will begin providing the credit.
5. Lifeline customers are required to provide documentation for the purpose of determining their continuing eligibility for the Lifeline credit, upon request of the Company, no less frequently than annually, in accordance with 47 CFR § 54.410.
6. The Lifeline service credit will be discontinued for customers who no longer meet the eligibility requirements for the Lifeline Service credit.

### Lifeline Credits for Lifeline Service On Tribal Lands

#### Monthly Credit

Federal Lifeline Credit:

\$34.25<sup>2</sup>

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Public Utility  
2014000912  
Tariff Sheets Approved  
per 165:55-5-10(c)

Pursuant to OAC 165:55-13-14 (e) the credit applied will not exceed the total of the federal end user charge and the residential local exchange rate, less \$1.00. In no instance will a subscriber's monthly local exchange rate be less than \$1.00 after the application of the Lifeline Credits.

Issued: 10-31-14

Legal Authority: OAC 165:55-5-10(c)

Effective: 11-1-14

SHIDLER TELEPHONE COMPANY

1. On September 18, 1992 the Company filed an Application for approval of a new Local Exchange Tariff in Cause No. PUD 1387.  
→ 7-19-92 TARIFFS FOR TULSA WALP WERE APPROVED
2. While the Application was still pending at the Commission, the Company filed for a \$2.00 rate increase pursuant to 17 O.S. §137 to be effective November 1, 1992.
3. The \$2.00 increase for local exchange rates became effective November 1, 1992.
4. Shidler's local exchange tariff was not approved until September 9, 1993 pursuant to Order No. 376405.
5. When the tariff sheets where stamp/filed approved for the new local exchange tariff, the local exchange rate sheets reflecting the \$2.00 increase were inadvertently not included because the \$2.00 rate increase became effective while the local exchange tariff was pending.

**Shidler Telephone Company**

**Study Area Code 432023**

**Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))**

Shidler Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service at with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, and offering broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream is reasonable, the Company offers broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream.

**Shidler Telephone Company (SAC 432023)**

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly  
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions<sup>1</sup> to which the ETC newly began providing broadband service. Shidler Telephone Company did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.

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<sup>1</sup> The FCC has defined community anchor institutions in Section 54.5 of its Rules as “schools, libraries, health care providers, community colleges, other institutions of higher education, and other community support organizations and entities.”

**REDACTED – FOR PUBLIC INSPECTION**

**ATTACHMENT - LINE 3017**

**ATTACHMENT REDACTED IN ENTIRETY**